

## THE HARMAN FIRM, LLP

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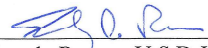
October 31, 2022

### MEMO ENDORSED

VIA ECF

**Hon. Edgardo Ramos, U.S.D.J.**  
United States District Court  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

The request to stay proceedings is denied. The pre-motion conference scheduled for November 1, 2022, at 4:00 p.m. is adjourned and rescheduled to November 17, 2022, at 3:30 p.m. So ordered.

  
Edgardo Ramos, U.S.D.J.  
Dated: November 1, 2022  
New York, New York

Re: Doris Calderon v. Global Holdings Mgmt. Group, et al.

**Case No.: 1:22-cv-6868 (ER)**

Dear Judge Ramos,

Plaintiff Doris Calderon, by and through her attorneys, The Harman Firm, LLP, hereby writes to notify the Court regarding possible claims against the 32BJ Union and, as well, a planned mediation.

This case is currently subject to mediation to be commenced on December 8, 2022. All parties and the 32BJ Union will attend. If the case is not settled there through mediation, Plaintiff intends to add additional claims and parties.

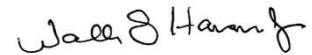
Plaintiff Calderon has been subject to unequal treatment, harassment, and retaliation for years. Most recently, on October 12, 2022, Calderon was told that her grievance on file, for an unjust bump in 2019, was denied and closed. The 32BJ Union has never given Ms. Calderon any meaningful attention to her claims of illegal activity at work. Now, the Union and/or building are continuing to retaliate against her by closing her grievance despite never providing any substantive investigation or reply on the matter.

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Plaintiff's counsel is out of the country for the week beginning October 31, 2022 with very limited access to reliable phone and internet access. Accordingly, we seek a stay of any proceedings until after the mediation and an adjournment of this week's conference until next week or the following. These requests are not made for purposes of delay, but, rather, are made in an effort to conserve judicial resources.

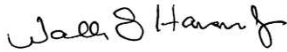


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**Attorney for Plaintiff**

### CERTIFICATE OF CONFERENCE

I certify that on October 31, 2022 my office conferred with Defendants on the substance of this letter. Defendants are unopposed to adjourning the conference until the week of November 7, 2022, but oppose a stay of the proceedings.



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